

Dear FCC,

RM-10867 by the ARRL is in my thinking, too generous for a 'beginners license'.

Here are some important points a beginners license should incorporate.

1. I feel a 'TERM LIMIT' on the license is required to make it a 'beginners license', and not an 'End All' license.
2. 50kHz on the top end of 75m, 40m, 15m, and 28.300-28,500MHz is more than enough spectrum for a beginners license.
3. A term limit of 1 or 2 years, gives a newcomer the incentive to learn and grow. This should be a non-renewable license.
4. 100 watts maximum power on all frequencies, including VHF/UHF. The test questions should have RF safety included.
5. The test should be broad enough to enlighten the newcomer to many ideas, modes, theories, safety issues, etc.
6. As for upgrading the Technician licensees to General Class, please don't do it, please read below.

As for the General and Extra Class and the elimination of the Technician classes.

1. Keep the current General class examination as is, including the 5wpm CW.
2. The current Technician class operator needs to specifically study important areas of HF operation, RF safety, data rates, band privileges, and other important HF operating topics that have not been tested for since March 1987. Allowing a new Technician class operator to automatically upgrade to General class could be physically dangerous around the higher allowed RF output levels. The Technician class applicant must study the requirements for HF and apply for a beginners license or upgrade by testing to general.
3. Keeping Extra class much like it is with a 5 wpm code test seems adequate, or make it 10wpm.
4. All Technician licenses will expire at the end of their term. The licensees will need to upgrade to General, or the new beginners class.

The important feature the FCC should attempt to incorporate into any rule making, is a incentive plan for all license classes to encourage advancement to the higher levels of amateur radio. Making a new class license that allows the newcomer to stagnate at the 'beginners' intelligence level will do nothing to improve the Amateur Radio Service. As for the ITU and their standards which are nice, but are not binding on what the USA does. We need to set the standard, not sink to the lack of standards other countries may adopt.

I personally feel RM-10868 (by the RAF) is a better approach.

If the FCC could take the best parts of both, think over my comments, especially about the term limit, and make a intelligent decision. One that will help Amateur Radio to grow, to grow strong with educated, law abiding people. To do this we need a incentive license package, that insists on excellence.

Thank your for your considerations, and time.
Sincerely,
Bruce Phegley W4OV

--
